

1 ROB BONTA  
Attorney General of California  
2 STEVEN D. MUNI  
Supervising Deputy Attorney General  
3 JOHN S. GATSCHET  
Deputy Attorney General  
4 State Bar No. 244388  
1300 I Street, Suite 125  
5 P.O. Box 944255  
Sacramento, CA 94244-2550  
6 Telephone: (916) 210-7546  
Facsimile: (916) 327-2247  
7

8 *Attorneys for Complainant*

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10 **BEFORE THE**  
**PHYSICIAN ASSISTANT BOARD**  
11 **DEPARTMENT OF CONSUMER AFFAIRS**  
12 **STATE OF CALIFORNIA**

13 In the Matter of the Accusation Against:

Case No. 950-2018-002048

14 **Steve Alexander Krikoriantz, P.A.**  
15 **680 Cohasset Rd.**  
**Chico, CA 95926-2213**

**A C C U S A T I O N**

16 **Physician Assistant License**  
17 **No. PA 15820,**

Respondent.

18  
19  
20 **PARTIES**

21 1. Rozana Khan (Complainant) brings this Accusation solely in her official capacity as  
22 the Executive Officer of the Physician Assistant Board (Board), Department of Consumer Affairs.

23 2. On or about May 3, 2001, the Physician Assistant Board issued Physician Assistant  
24 License No. PA 15820 to Steve Alexander Krikoriantz, P.A. (Respondent). The Physician  
25 Assistant License was in full force and effect at all times relevant to the charges brought herein  
26 and will expire on March 31, 2023, unless renewed.

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**JURISDICTION**

3. This Accusation is brought before the Board, under the authority of the following laws. All section references are to the Business and Professions Code (Code) unless otherwise indicated.

4. Section 3504.1 of the Code states:

Protection of the public shall be the highest priority for the Physician Assistant Board in exercising its licensing, regulatory, and disciplinary functions. Whenever the protection of the public is inconsistent with other interests sought to be promoted, the protection of the public shall be paramount.

5. Section 3527 of the Code states:

(a) The board may order the denial of an application for, or the issuance subject to terms and conditions of, or the suspension or revocation of, or the imposition of probationary conditions upon a PA license after a hearing as required in Section 3528 for unprofessional conduct that includes, but is not limited to, a violation of this chapter, a violation of the Medical Practice Act, or a violation of the regulations adopted by the board or the Medical Board of California.

(b) The board may order the denial of an application for, or the suspension or revocation of, or the imposition of probationary conditions upon, an approved program after a hearing as required in Section 3528 for a violation of this chapter or the regulations adopted pursuant thereto.

(c) The Medical Board of California may order the imposition of probationary conditions upon a physician and surgeon's authority to supervise a PA, after a hearing as required in Section 3528, for unprofessional conduct, which includes, but is not limited to, a violation of this chapter, a violation of the Medical Practice Act, or a violation of the regulations adopted by the board or the Medical Board of California.

(d) The board may order the denial of an application for, or the suspension or revocation of, or the imposition of probationary conditions upon, a PA license, after a hearing as required in Section 3528 for unprofessional conduct that includes, except for good cause, the knowing failure of a licensee to protect patients by failing to follow infection control guidelines of the board, thereby risking transmission of bloodborne infectious diseases from licensee to patient, from patient to patient, and from patient to licensee. In administering this subdivision, the board shall consider referencing the standards, regulations, and guidelines of the State Department of Health developed pursuant to Section 1250.11 of the Health and Safety Code and the standards, regulations, and guidelines pursuant to the California Occupational Safety and Health Act of 1973 (Part 1 (commencing with Section 6300) of Division 5 of the Labor Code) for preventing the transmission of HIV, hepatitis B, and other bloodborne pathogens in health care settings. As necessary, the board shall consult with the Medical Board of California, the Osteopathic Medical Board of California, the Podiatric Medical Board of California, the Dental Board of California, the Board of Registered Nursing, and the Board of Vocational Nursing and Psychiatric Technicians of the State of California to encourage appropriate consistency in the implementation of this subdivision.

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1 The board shall seek to ensure that licensees are informed of the responsibility of  
2 licensees and others to follow infection control guidelines, and of the most recent  
scientifically recognized safeguards for minimizing the risk of transmission of  
bloodborne infectious diseases.

3 (e) The board may order the licensee to pay the costs of monitoring the  
4 probationary conditions imposed on the license.

5 (f) The expiration, cancellation, forfeiture, or suspension of a PA license by  
6 operation of law or by order or decision of the board or a court of law, the placement  
7 of a license on a retired status, or the voluntary surrender of a license by a licensee shall  
not deprive the board of jurisdiction to commence or proceed with any investigation  
of, or action or disciplinary proceeding against, the licensee or to render a decision  
suspending or revoking the license.

8 6. Title 16, California Code of Regulations, section 1399.521 states, in pertinent part:

9 In addition to the grounds set forth in section 3527, subdivision (a) of the code  
10 the board may...suspend, revoke or place on probation a physician assistant for the  
11 following causes: (a) Any violation of the State Medical Practice Act which would  
constitute unprofessional conduct for a physician and surgeon.

### 12 **STATUTORY PROVISIONS**

13 7. Section 2234 of the Code states:

14 The board shall take action against any licensee who is charged with  
15 unprofessional conduct.<sup>1</sup> In addition to other provisions of this article, unprofessional  
conduct includes, but is not limited to, the following:

16 (a) Violating or attempting to violate, directly or indirectly, assisting in or  
17 abetting the violation of, or conspiring to violate any provision of this chapter.

18 (b) Gross negligence.

19 (c) Repeated negligent acts. To be repeated, there must be two or more negligent  
20 acts or omissions. An initial negligent act or omission followed by a separate and  
distinct departure from the applicable standard of care shall constitute repeated  
negligent acts.

21 (1) An initial negligent diagnosis followed by an act or omission  
22 medically appropriate for that negligent diagnosis of the patient shall  
constitute a single negligent act.

23 (2) When the standard of care requires a change in the diagnosis, act, or  
24 omission that constitutes the negligent act described in paragraph (1),  
including, but not limited to, a reevaluation of the diagnosis or a change  
25 in treatment, and the licensee's conduct departs from the applicable  
standard of care, each departure constitutes a separate and distinct breach  
of the standard of care.

26  
27 <sup>1</sup> Unprofessional conduct under Section 2234 of the Code is conduct which breaches the  
28 rules or ethical code of the medical profession, or conduct which is unbecoming to a member in  
good standing of the medical profession, which demonstrates an unfitness to practice medicine.  
(*Shea v. Board of Medical Examiners* (1978) 81 Cal.App.3d 564, 575.)

(d) Incompetence.

(e) The commission of any act involving dishonesty or corruption that is substantially related to the qualifications, functions, or duties of a physician and surgeon.

(f) Any action or conduct that would have warranted the denial of a certificate.

(g) The failure by a certificate holder, in the absence of good cause, to attend and participate in an interview by the board. This subdivision shall only apply to a certificate holder who is the subject of an investigation by the board.

8. Section 2242 of the Code states:

(a) Prescribing, dispensing, or furnishing dangerous drugs as defined in Section 4022 without an appropriate prior examination and a medical indication, constitutes unprofessional conduct. An appropriate prior examination does not require a synchronous interaction between the patient and the licensee and can be achieved through the use of telehealth, including, but not limited to, a self-screening tool or a questionnaire, provided that the licensee complies with the appropriate standard of care.

(b) No licensee shall be found to have committed unprofessional conduct within the meaning of this section if, at the time the drugs were prescribed, dispensed, or furnished, any of the following applies:

(1) The licensee was a designated physician and surgeon or podiatrist serving in the absence of the patient's physician and surgeon or podiatrist, as the case may be, and if the drugs were prescribed, dispensed, or furnished only as necessary to maintain the patient until the return of the patient's practitioner, but in any case no longer than 72 hours.

(2) The licensee transmitted the order for the drugs to a registered nurse or to a licensed vocational nurse in an inpatient facility, and if both of the following conditions exist:

(A) The practitioner had consulted with the registered nurse or licensed vocational nurse who had reviewed the patient's records.

(B) The practitioner was designated as the practitioner to serve in the absence of the patient's physician and surgeon or podiatrist, as the case may be.

(3) The licensee was a designated practitioner serving in the absence of the patient's physician and surgeon or podiatrist, as the case may be, and was in possession of or had utilized the patient's records and ordered the renewal of a medically indicated prescription for an amount not exceeding the original prescription in strength or amount or for more than one refill.

(4) The licensee was acting in accordance with Section 120582 of the Health and Safety Code."

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1           9.     Section 4021 of the Code states:

2                 ‘Controlled substance’ means any substance listed in Chapter 2 (commencing with  
3                 Section 11053) of Division 10 of the Health and Safety Code.”

4           10.    Section 4022 of the Code states:

5                 ‘Dangerous drug’ or ‘dangerous device’ means any drug or device unsafe for self-use  
6                 in humans or animals, and includes the following:

7                 (a) Any drug that bears the legend: ‘Caution: federal law prohibits dispensing without  
8                 prescription,’ ‘Rx only,’ or words of similar import.

9                 ...

10                (c) Any other drug or device that by federal or state law can be lawfully dispensed  
11                only on prescription or furnished pursuant to Section 4006.”

12           11.    Section 3501 of the Code states in pertinent part:

13                 (a) As used in this chapter:

14                 ...

15                 (4) “Physician assistant” means a person who meets the requirements of this  
16                 chapter and is licensed by the board.

17                 (5) “Supervising physician” or “supervising physician and surgeon” means a  
18                 physician and surgeon licensed by the Medical Board of California or by the  
19                 Osteopathic Medical Board of California who supervises one or more physician  
20                 assistants, who possesses a current valid license to practice medicine, and who is not  
21                 currently on disciplinary probation for improper use of a physician assistant.

22                 (6) “Supervision” means that a licensed physician and surgeon oversees the  
23                 activities of, and accepts responsibility for, the medical services rendered by a  
24                 physician assistant.

25                 ...

26           12.    Section 3502 of the Code states in pertinent part:

27                 (a) Notwithstanding any other law, a physician assistant may perform those  
28                 medical services as set forth by the regulations adopted under this chapter when the  
29                 services are rendered under the supervision of a licensed physician and surgeon who is  
30                 not subject to a disciplinary condition imposed by the Medical Board of California  
31                 prohibiting that supervision or prohibiting the employment of a physician assistant. The  
32                 medical record, for each episode of care for a patient, shall identify the physician and  
33                 surgeon who is responsible for the supervision of the physician assistant (1) The PA  
34                 renders the services under the supervision of a licensed physician and surgeon who is  
35                 not subject to a disciplinary condition imposed by the Medical Board of California or  
36                 by the Osteopathic Medical Board of California prohibiting that supervision or  
37                 prohibiting the employment of a physician assistant.

1 (b) (1) Notwithstanding any other law, a physician assistant performing medical  
2 services under the supervision of a physician and surgeon may assist a doctor of  
3 podiatric medicine who is a partner, shareholder, or employee in the same medical  
4 group as the supervising physician and surgeon. A physician assistant who assists a  
5 doctor of podiatric medicine pursuant to this subdivision shall do so only according to  
6 patient-specific orders from the supervising physician and surgeon.

7 (2) The supervising physician and surgeon shall be physically available  
8 to the physician assistant for consultation when that assistance is rendered. A  
9 physician assistant assisting a doctor of podiatric medicine shall be limited to  
10 performing those duties included within the scope of practice of a doctor of  
11 podiatric medicine.

12 (c)(1) A physician assistant and his or her supervising physician and surgeon  
13 shall establish written guidelines for the adequate supervision of the physician assistant.  
14 This requirement may be satisfied by the supervising physician and surgeon adopting  
15 protocols for some or all of the tasks performed by the physician assistant. The  
16 protocols adopted pursuant to this subdivision shall comply with the following  
17 requirements:

18 (A) A protocol governing diagnosis and management shall, at a minimum,  
19 include the presence or absence of symptoms, signs, and other data necessary to  
20 establish a diagnosis or assessment, any appropriate tests or studies to order,  
21 drugs to recommend to the patient, and education to be provided to the patient.

22 ...

23 (D) Protocols shall be signed and dated by the supervising physician and  
24 surgeon and the physician assistant.

25 ...

26 13. Section 3502.1 of the Code<sup>2</sup> states:

27 In addition to the medical services authorized in the regulations adopted pursuant  
28 to Section 3502, and except as prohibited by Section 3502, a PA may furnish or order  
a drug or device subject to all of the following:

(a) The PA shall furnish or order a drug or device in accordance with the practice  
agreement and consistent with the PA's educational preparation or for which clinical  
competency has been established and maintained.

(b)(1) A practice agreement authorizing a PA to order or furnish a drug or device  
shall specify which PA or PA's may furnish or order a drug or device, which drugs or  
devices may be furnished or ordered, under what circumstances, the extent of physician  
and surgeon supervision, the method of periodic review of the PA's competence,  
including peer review, and review of the practice agreement.

(2) In addition to the requirements in paragraph (1), if the practice  
agreement authorizes the PA to furnish a Schedule II controlled substance,  
the practice agreement shall address the diagnosis of the illness, injury, or  
condition for which the PA may furnish the Schedule II controlled substance.

<sup>2</sup> Amended by Stats.2018, c. 693 (S.B.1109), § 10, eff. Jan. 1, 2019; Stats.2019, c. 707  
(S.B.697), § 4, eff. Jan. 1, 2020.)

1 (c) The PA shall furnish or order drugs or devices under physician and surgeon  
2 supervision. This subdivision shall not be construed to require the physical presence of  
3 the physician and surgeon, but does require the following:

4 (1) Adherence to adequate supervision as agreed to in the practice  
5 agreement.

6 (2) The physician and surgeon be available by telephone or other  
7 electronic communication method at the time the PA examines the patient.

8 (d)(1) Except as provided in paragraph (2), the PA may furnish or order only  
9 those Schedule II through Schedule V controlled substances under the California  
10 Uniform Controlled Substances Act (Division 10 (commencing with Section 11000) of  
11 the Health and Safety Code) that have been agreed upon in the practice agreement.

12 (2) The PA may furnish or order Schedule II or III controlled  
13 substances, as defined in Sections 11055 and 11056, respectively, of the  
14 Health and Safety Code, in accordance with the practice agreement or a  
15 patient-specific order approved by the treating or supervising physician and  
16 surgeon.

17 (e)(1) The PA has satisfactorily completed a course in pharmacology covering  
18 the drugs or devices to be furnished or ordered under this section or has completed a  
19 program for instruction of PAs that meet the requirements of Section 1399.530 of Title  
20 16 of the California Code of Regulations, as that provision read on June 7, 2019.

21 (2) A physician and surgeon through a practice agreement may  
22 determine the extent of supervision necessary pursuant to this section in the  
23 furnishing or ordering of drugs and devices.

24 (3) PAs who hold an active license, who are authorized through a  
25 practice agreement to furnish Schedule II controlled substances, and who are  
26 registered with the United States Drug Enforcement Administration, and who  
27 have not successfully completed a one-time course in compliance with  
28 Sections 1399.610 and 1399.612 of Title 16 of the California Code of  
Regulations, as those provisions read on June 7, 2019, shall complete, as part  
of their continuing education requirements, a course that covers Schedule II  
controlled substances, and the risks of addiction associated with their use,  
based on the standards developed by the board. The board shall establish the  
requirements for satisfactory completion of this subdivision. Evidence of  
completion of a course meeting the standards, including pharmacological  
content, established in Sections 1399.610 and 1399.612 of Title 16 of the  
California Code of Regulations, as those provisions read on June 7, 2019,  
shall be deemed to meet the requirements of this section.

(f) For purposes of this section:

(1) "Furnishing" or "ordering" shall include the following:

(A) Ordering a drug or device in accordance with the practice agreement.

(B) Transmitting an order of a supervising physician and surgeon.

(C) Dispensing a medication pursuant to Section 4170.

(2) "Drug order" or "order" means an order for medication that is

dispensed to or for an ultimate user, issued by a PA as an individual practitioner, within the meaning of Section 1306.02 of Title 21 of the Code of Federal Regulations.

(g) Notwithstanding any other law, (1) a drug order issued pursuant to this section shall be treated in the same manner as a prescription of a supervising physician; (2) all references to "prescription" in this code and the Health and Safety Code shall include drug orders issued by physician assistants; and (3) the signature of a PA on a drug order issued in accordance with this section shall be deemed to be the signature of a prescriber for purposes of this code and the Health and Safety Code.

14. Section 3502.3 of the Code states:

(a) Notwithstanding any other provision of law, in addition to any other practices that meet the general criteria set forth in this chapter or the Medical Board of California's regulations for inclusion in a delegation of services agreement, a delegation of services agreement may authorize a physician assistant to do any of the following:

(1) Order durable medical equipment, subject to any limitations set forth in Section 3502 or the delegation of services agreement. Notwithstanding that authority, nothing in this paragraph shall operate to limit the ability of a third-party payer to require prior approval.

(2) For individuals receiving home health services or personal care services, after consultation with the supervising physician, approve, sign, modify, or add to a plan of treatment or plan of care.

(3) After performance of a physical examination by the physician assistant under the supervision of a physician and surgeon consistent with this chapter, certify disability pursuant to Section 2708 of the Unemployment Insurance Code. The Employment Development Department shall implement this paragraph on or before January 1, 2017.

(b) Nothing in this section shall be construed to affect the validity of any delegation of services agreement in effect prior to the enactment of this section or those adopted subsequent to enactment..

### **COST RECOVERY**

15. Section 125.3 of the Code states:

(a) Except as otherwise provided by law, in any order issued in resolution of a disciplinary proceeding before any board within the department or before the Osteopathic Medical Board, upon request of the entity bringing the proceeding, the administrative law judge may direct a licensee found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

(b) In the case of a disciplined licensee that is a corporation or a partnership, the order may be made against the licensed corporate entity or licensed partnership.

(c) A certified copy of the actual costs, or a good faith estimate of costs where actual costs are not available, signed by the entity bringing the proceeding or its designated representative shall be prima facie evidence of reasonable costs of



1 investigation and prosecution of the case. The costs shall include the amount of  
2 investigative and enforcement costs up to the date of the hearing, including, but not  
3 limited to, charges imposed by the Attorney General.

4 (d) The administrative law judge shall make a proposed finding of the amount  
5 of reasonable costs of investigation and prosecution of the case when requested  
6 pursuant to subdivision (a). The finding of the administrative law judge with regard to  
7 costs shall not be reviewable by the board to increase the cost award. The board may  
8 reduce or eliminate the cost award, or remand to the administrative law judge if the  
9 proposed decision fails to make a finding on costs requested pursuant to subdivision  
10 (a).

11 (e) If an order for recovery of costs is made and timely payment is not made as  
12 directed in the board's decision, the board may enforce the order for repayment in any  
13 appropriate court. This right of enforcement shall be in addition to any other rights  
14 the board may have as to any licensee to pay costs.

15 (f) In any action for recovery of costs, proof of the board's decision shall be  
16 conclusive proof of the validity of the order of payment and the terms for payment.

17 (g) (1) Except as provided in paragraph (2), the board shall not renew or  
18 reinstate the license of any licensee who has failed to pay all of the costs ordered  
19 under this section.

20 (2) Notwithstanding paragraph (1), the board may, in its discretion,  
21 conditionally renew or reinstate for a maximum of one year the license of any  
22 licensee who demonstrates financial hardship and who enters into a formal agreement  
23 with the board to reimburse the board within that one-year period for the unpaid  
24 costs.

25 (h) All costs recovered under this section shall be considered a reimbursement  
26 for costs incurred and shall be deposited in the fund of the board recovering the costs  
27 to be available upon appropriation by the Legislature.

28 (i) Nothing in this section shall preclude a board from including the recovery of  
the costs of investigation and enforcement of a case in any stipulated settlement.

(j) This section does not apply to any board if a specific statutory provision in  
that board's licensing act provides for recovery of costs in an administrative  
disciplinary proceeding.

### **PERTINENT DRUG INFORMATION**

22 16. Clonazepam – Generic name for the drug Klonopin. Clonazepam is an anti-anxiety  
23 medication in the benzodiazepine family used to prevent seizures, panic disorder, and akathisia.  
24 Clonazepam is a Schedule IV controlled substance pursuant to Code of Federal Regulations Title  
25 21 section 1308.14(c). It is also a Schedule IV controlled substance pursuant to Health and  
26 Safety Code section 11057, subdivision (d), and a dangerous drug pursuant to Business and  
27 Professions Code section 4022.

17. Testosterone – Generic name for the drugs Striant, Natesto, AndroGel, Androderm, Axiron, Depo-testosterone and Testopel. Testosterone is a medication and naturally occurring steroid hormone used for the treatment of male hypogonadism, and gender dysphoria. Long-term adverse effects of testosterone therapy can include cardiovascular disease and prostate cancer. Testosterone is a Schedule III controlled substance pursuant to Code of Federal Regulations Title 21 section 1308.13, subdivision (f). It is a dangerous drug pursuant to Business and Professions Code section 4022 and is a Schedule III controlled substance pursuant to California Health and Safety Code section 11055 subdivision (f).

18. Zolpidem tartrate – Generic name for the drug Ambien. Zolpidem tartrate is a sedative and hypnotic used for short-term treatment of insomnia. Zolpidem tartrate is a Schedule IV controlled substance pursuant to Code of Federal Regulations Title 21 section 1308.14(c). It is a Schedule IV controlled substance pursuant to Health and Safety Code section 11057, subdivision (d), and a dangerous drug pursuant to Business and Professions Code section 4022.

### **FACTUAL ALLEGATIONS**

19. Respondent is a physician assistant who has been working for Ampla Health clinics since approximately 2013. On or about May 12, 2020, Respondent entered into a contract and collaborative practice agreement with Ampla Health clinics to serve as a physician assistant.

#### **Patient 1<sup>3</sup>**

20. Patient 1, a 68-year-old male patient, received treatment from Respondent beginning in early 2000 for fatigue related to loss of sleep, loss of libido, and erectile dysfunction. Thereafter, Patient 1 was co-managed for other reported issues such as pulmonary care, hypertension, anxiety, and hypogonadism.

21. According to a review of Patient 1's medical records, Respondent conducted an analysis of Patient 1's testosterone levels and prostate-specific antigen (PSA) once in September 2017. According to a review of Patient 1's CURES<sup>4</sup> reports, Respondent prescribed Patient

<sup>3</sup> To protect the privacy of the patients and witnesses involved, the patients and witnesses names were not included in this pleading. Respondent is aware of the identity of each patient and witness, all patients and witnesses will be fully identified in discovery.

<sup>4</sup> Controlled Substance Utilization Review and Evaluation System (CURES) is a database

1 testosterone in powder form on almost a monthly basis beginning in March 2016 and continuing  
2 through June 2019. Patient 1's medical records however do not contain any documentation of  
3 absolute contraindications, including prostate cancer or a prostate specific antigen greater than  
4 4ng/ml that was checked by Respondent at the time of the testosterone prescriptions; nor do  
5 Patient 1's medical records contain follow-up labs checked by Respondent after the testosterone  
6 prescriptions were filled by Patient 1.

7 22. According to a review of Patient 1's medical records and the CURES reports,  
8 Respondent prescribed Patient 1 30 tablets of Ambien at 10 mg every 30 days from November  
9 2018 through April 2019. From February 2019 through April 2019, Respondent simultaneously  
10 prescribed Patient 1 30 tablets of clonazepam at 1 mg every 30 days. While concurrently being  
11 prescribed Ambien and clonazepam by Respondent, Patient 1 was over 65 years old.

12 **Patient 2**

13 23. Patient 2, a 50 year-old male patient, received treatment from Respondent beginning  
14 in 2016 for hypogonadism.

15 24. According to a review of Patient 2's medical records, Respondent conducted  
16 laboratory analyses of Patient 2's testosterone levels in March 2017, which were above the  
17 normal reference range; and in December 2018 and November 2019, which were both within the  
18 laboratory reference range. Respondent also obtained Patient 2's PSA test results in November  
19 2019, which were within the laboratory reference range. As treatment, Respondent prescribed  
20 Depo-testosterone to Patient 2 in 2017 through 2020.

21 25. In light of these laboratory results, according to a review of Walgreens Pharmacy  
22 certified records, Respondent prescribed Patient 2 Depo-testosterone injections at 300 mg weekly  
23 in January, March, April, and December 2018 as well as in June and September 2019.

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28 maintained by the California Department of Justice, which tracks all controlled drug prescriptions  
that are dispensed in the State of California.

1 **FIRST CAUSE FOR DISCIPLINE**

2 **(Gross Negligence)**

3 26. Respondent Steve Alexander Krikoriantz, P.A. has subjected his Physician Assistant  
4 License No. PA 15820 to disciplinary action under sections 3527 and 2234, as defined by section  
5 2234, subdivision (b), of the Code, in that he committed gross negligence in his care and  
6 treatment of Patient 1. The circumstances are set forth in paragraphs 19 through 25, above, which  
7 are hereby incorporated by reference and re-alleged as if fully set forth herein.

8 27. Respondent's license is subject to disciplinary action because he committed gross  
9 negligence during the care and treatment of Patient 1 in the following distinct and separate way:

10 a. By prescribing Patient 1 multiple central nervous system depressants  
11 concurrently who was at the time, older than 65 years of age.

12 **SECOND CAUSE FOR DISCIPLINE**

13 **(Repeated Acts of Negligence)**

14 28. Respondent Steve Alexander Krikoriantz, P.A. has further subjected his Physician  
15 Assistant License No. PA 15820 to disciplinary action under section sections 3527 and 2234, as  
16 defined by section 2234, subdivision (c), of the Code, in that he committed repeated negligent  
17 acts in his care and treatment of Patients 1 and 2 as more particularly alleged in paragraphs 19  
18 through 25, above, which are hereby incorporated by reference and re-alleged as if fully set forth  
19 herein.

20 29. The instance of a gross departure from the standard of care as set forth in paragraph  
21 27, is incorporated by reference as if fully set forth herein and serves as a repeated negligent act.

22 30. Respondent's license is subject to disciplinary action because he committed repeated  
23 negligent acts during the care and treatment of Patients 1 and 2 in the following additional distinct  
24 and separate ways:

25 a. By prescribing Patient 1 testosterone without checking appropriate laboratories  
26 or ruling out absolute contraindications; and

27 b. By prescribing Patient 2 Depo-testosterone in excess of the recommended  
28 amounts without laboratory results to justify the increased dosage level.

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**THIRD CAUSE FOR DISCIPLINE**

**(General Unprofessional Conduct)**

31. Respondent Steve Alexander Krikoriantz, P.A. has further subjected his Physician Assistant License No. PA 15820 to disciplinary action under section 3527, subdivision (a), section 2234, subdivision (a) of the Code and California Code of Regulations, title 16, section 1399.521, in that he has engaged in conduct which breaches the rules or ethical code of the medical profession, or conduct which is unbecoming of a member in good standing to his care and treatment of Patients 1 and 2 in addition to his overall conduct, as more particularly alleged in paragraphs 19 through 30, above, which are hereby incorporated by reference and re-alleged as if fully set forth herein.

**DISCIPLINARY CONSIDERATIONS**

32. To determine the degree of discipline, if any, to be imposed on Respondent Steve Alexander Krikoriantz, P.A., Complainant alleges that on or about January 25, 2013, in a prior disciplinary action titled *In the Matter of the Accusation Against Steve Krikoriantz, P.A.* before the Physician Assistant Board, in Case No. 1E-2010-210162, Respondent’s license was publicly reprimanded pursuant to Business and Professions Code section 2227, subdivision (a)(4) for “Respondent’s care and treatment of Patient T.H. as set forth in Accusation 1E-2010-210162 as follows: from November 2007 through June 2010, Respondent prescribed various controlled substances to Patient T.H. without having completed a required controlled substance education course and/or without a practice specific formulary.” That decision is now final and is incorporated by reference as if fully set forth herein.

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1 **PRAYER**

2 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
3 and that following the hearing, the Physician Assistant Board issue a decision:

4 1. Revoking or suspending Physician Assistant License No. PA 15820, issued to Steve  
5 Alexander Krikoriantz, P.A.;

6 2. Ordering Steve Alexander Krikoriantz, P.A., to pay the Board the costs of the  
7 investigation and enforcement of this case, and if placed on probation, the costs of probation  
8 monitoring; and

9 3. Taking such other and further action as deemed necessary and proper.

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11 DATED: June 3, 2022

*Rozana Khan*

ROZANA KHAN  
Executive Officer  
Physician Assistant Board  
Department of Consumer Affairs  
State of California  
Complainant

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